



KREINDLER & KREINDLER LLP | 750 Third Avenue | New York, NY 10017-2725

office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

MEMO ENDORSED


September 18, 2020

Via ECF/CM

Hon. Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Mr. Christian's sentencing is adjourned to December 9, 2020, at 11 a.m. Mr. Thomas' sentencing is adjourned to December 10, 2020, at 11 a.m.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 9/21/2020
New York, New York

Re: *United States v. Christian, et al.* (Raymond Christian) 12 Cr. 626

Dear Judge Ramos:

I represent Raymond Christian and hereby ask the Court to adjourn the sentencing currently scheduled for Oct. 2, 2020 until a date when the hearing can safely proceed in-person such that not only may Mr. Christian attend but that his family members and friends can also be physically present. This request is jointly made with Sabrina Shroff, Esq., counsel for co-defendant Glenn Thomas, who likewise requests an adjournment.¹

While the defendants have been incarcerated at the Metropolitan Correctional Center (MCC) for many years and are no doubt eager to move to a safer facility, given the very serious potential sentencing exposure they face, despite the health risks at the MCC, it is critical that their sentencing proceed in person with all of their supporters present, the number of which appears to exceed the current limitations on attendance. Additionally, both counsel intend to submit updated sentencing materials in advance of the hearing and the additional time is thus needed in order to obtain the information necessary for the supplemental submission, including all relevant health (physical and / or mental) for the co-defendants.

I have conferred with the government and it has no objection to this request. This would be the first sentencing adjournment since Ms. Shroff was appointed to represent Mr. Thomas and the fourth adjournment for Mr. Christian following decision on the post-trial motions.

To allow the sentencing to proceed in person and to have the necessary time to submit supplemental materials we respectfully ask that this Court adjourn the Oct. 2, 2020 sentencing of Mr. Christian and Mr. Thomas until a date in or after Dec, 2020.

Respectfully submitted,

/s/

Megan W. Benett
Counsel for Raymond Christian

cc: All counsel of record via ECF/CM

¹ Ms. Shroff was appointed to represent Mr. Thomas during the covid-19 pandemic and has not even been able to meet him in person yet.

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